

**IN THE NORTHERN DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE)	
NORTHERN ILLINOIS BENEFIT FUND,)	
BOARD OF TRUSTEES OF THE)	
NORTHERN ILLINOIS PENSION FUND,)	
BOARD OF TRUSTEES OF THE)	
NORTHERN ILLINOIS EDUCATION)	
FUND, BOARD OF TRUSTEES OF)	No. 11 C 8034
THE NORTHERN ILLINOIS)	
RETIREMENT FUND,)	Judge Lefkow
)	
Plaintiffs,)	Magistrate Judge Cole
)	
v.)	
)	
THE ANDRZEJEWSKI CORP. d/b/a)	
BRUNO FRANCIS PLUMBING CO.,)	
an Illinois corporation,)	
)	
Defendant.)	

PLAINTIFFS' UNOPPOSED MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COME the Plaintiffs, THE BOARDS OF TRUSTEES OF THE VARIOUS NORTHERN ILLINOIS BENEFIT FUNDS, by and through their attorneys, ANDREW S. PIGOTT, DONALD D. SCHWARTZ, and ARNOLD & KADJAN, and, in their Unopposed Motion for Judgment in Sum Certain, state as follows:

1. Plaintiffs served Defendant, THE ANDRZEJEWSKI CORP. d/b/a BRUNO FRANCIS PLUMBING CO., with their Complaint seeking a fringe benefit contribution audit for the period August 1, 2011 through the present, as well as a wage audit, on November 30, 2011.
2. On January 6, 2012, this Court entered an Agreed Order commanding the audit.
3. After receiving a copy of the audit report for the fringe benefit contribution audit performed pursuant to this Court's January 6 Order, Plaintiffs' counsel provided a copy to

Defendant's counsel for his review and to facilitate the presentation of any challenges to the audit's findings, on January 30, 2012. (Combined fringe benefit and wage audit reports attached as Ex. A).

4. After receiving a copy of the audit report for the wage audit performed pursuant to this Court's January 6 Order, along with a summary of amounts due from the Funds, Plaintiffs' counsel provided copies to Defendant's counsel for his review and to facilitate the presentation of any challenges to the audit's findings, on February 8, 2012.

5. On February 6, 2012, Defendant's counsel notified Plaintiffs' counsel that Defendant had no challenges to the fringe benefit contribution audit and concurred with the audit findings.

6. On February 13, 2012, 2012 the Defendant's counsel notified Plaintiffs' counsel that Defendant had no challenges to the wage audit findings and the Funds' summary of amounts due and concurred with their findings.

7. Defendant, therefore, does not oppose the entry of judgment against it in the amount of \$69,412.24.

WHEREFORE, Plaintiffs ask this Court to enter judgment in their favor in the amount of \$69,412.24.

Respectfully submitted,
TRUSTEES OF THE NORTHERN ILLINOIS
BENEFIT FUNDS

By : /s Andrew S. Pigott
One of their attorneys

Donald D. Schwartz
Andrew S. Pigott
ARNOLD & KADJAN
203 North LaSalle Street, Suite 1650
Chicago, IL 60601
(312) 236-0415